

# ABRAMS FENSTERMAN

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June 17, 2021

Via ECF

Magistrate Peggy Kuo  
United States District Court Magistrate  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Jamell O'Neal, et al. v. Unites States of America, et al.*  
19-CV-05039 (MKB)(SMG)

Your Honor:

We represent plaintiffs in the above referenced action and write this letter to request a premotion conference and in the interim to request a stay of the June 18, 2021 deadline to submit the joint discovery plan. I apologize for this request not being submitted 48 hours in advance of the deadline, I had been engaged in a trial and then was immediately engaged in daily depositions until late yesterday. However, my partner did confer with the government who does not oppose a request for an extension of the deadline to submit the joint discovery plan and who indicated that a conference may be helpful in that regard.

The request for a premotion conference is based upon plaintiffs' request to file a motion to stay this action *sine die* pending resolution of the related class action, *Scott, et al. v. United States of America, et al.*, 19-cv-1075, of which these plaintiffs are class members.

It is anticipated that such a conference may alleviate the need for motion practice.

Respectfully,

A handwritten signature in black ink, appearing to read 'Amy Marion', with a stylized flourish at the end.

Amy Marion

cc: Via ECF  
Shana C. Priore